

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 4:17CR177
	§	Judge Mazzant
CLARENCE ROLAND (2)	§	

ELEMENTS OF THE OFFENSE

You are charged in Count One of the Superseding Indictment with a violation of 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud Affecting a Financial Institution in violation of 18 U.S.C. § 1343). The elements of the offense are as follows:

18 U.S.C. § 1349

First: That two or more persons, in some way or manner, came to a mutual understanding to try to accomplish a common and unlawful plan to violate 18 U.S.C. § 1343 as charged in the Superseding Indictment;
and

Second: That the defendant, knowing the unlawful purpose of the plan, willfully joined in it.

18 U.S.C. § 1343

First: That the defendant knowingly devised a scheme to defraud and to obtain money and property by false and fraudulent pretenses, representations, and promises;

Second: That the defendant acted with specific intent to defraud;

Third: That the defendant transmitted or caused to be transmitted by way of wire communications, in interstate commerce, any writing, sign, signal, or sound for the purpose of carrying out the scheme;

Fourth: That the scheme to defraud employed false material representations; and

Fifth: That the scheme affected a financial institution.

Respectfully submitted,

JOSEPH D. BROWN
UNITED STATES ATTORNEY

/s/_____
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CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the foregoing was served by electronic filing to counsel for the defendant on this the 18th day of June, 2018.

/s/_____
Christopher A. Eason